UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Via U.S. Postal Service and Email

April 18, 2014

Mr. Hajime Ogimi
Country Club of the Pacific
215 CCP Lane
Yona, Guam 96915
hajime@ccpguam.net

Re: Polychlorinated Biphenyls (PCBs), Toxic Substances Control Act - Site Work Plan PCB Transformer Removal and Cleanup Country Club of the Pacific, Yona, Guam – Releases from Japanese-Manufactured PCB Transformers Containing Kanechlor

Dear Hajime-San:

Thank you for submitting the *"Site Work Plan Contaminated Soil Removal Action, Country Club of the Pacific, Yona, Guam"* (Work Plan) dated February 20, 2014 and prepared by Unitek Environmental Guam (UEG). The U.S. Environmental Protection Agency Region 9 (EPA) is approving the Work Plan with conditions consistent with the Toxic Substances Control Act (TSCA) regulations for cleanup of polychlorinated biphenyls (PCBs) in 40 CFR 761.61(a) (self-implementing PCB cleanup) and 761.61(c) (risk-based disposal approval). EPA's approval is enclosed.

In general, the Work Plan covers removal of PCB wastes located at the Country Club of the Pacific (CCP) in Yona, Guam; and disposal of that PCB waste in the Continental United States (Continental US). That waste includes three Japanese-manufactured PCB transformers[1] (Transformers), PCB oil (Kanechlor 300 and/or Kanechlor 400), and bulk (e.g., soils and concrete containing PCBs) and liquid (e.g., water contaminated with PCB oil) PCB remediation wastes. The Serial Numbers (SN) of the Transformers to be disposed of are 7291763 (Transformer 1), 07291764 (Transformer 2), and 07291764 (Transformer 3). Transformers 1, 2, and 3 contain PCBs at 1,450, 2,550, and 1,570 ppm, respectively.

According to UEG, Transformers 1, 2, and 3 were in Guam before January 1, 1979; and the above PCB wastes were derived from releases of PCB oil from Transformers 2 and 3. Therefore, consistent with 40 CFR 761.99(c), the above PCB wastes can be transported to the Continental US for disposal. This determination is documented in the EPA Headquarters (EPA HQ, William Noggle) February 12, 2014 Email message responding to UEG's (LeRoy Moore) February 11, 2014 letter to EPA HQ

[1]The transformers were manufactured by Kitashiba Electric Co. LTD of Japan. The Japanese-manufactured transformers had been out of service since the late 1970s and contained Kanechlor 300 and/or Kanechlor 400, a Japanese-manufactured PCB oil.

regarding disposal of the above PCB waste. This correspondence is attached to the enclosed approval.

In concluding, EPA brings to your attention that if releases of PCBs were to occur at the CCP in the future, such releases or spills must be promptly reported to the National Response Center (NRC) as required in 40 CFR 761 Subpart G (PCB Spill Cleanup Policy). The PCB releases from the PCB Transformers were not reported to the NRC.

If you have any questions concerning this approval, please call Carmen D. Santos at 415.972.3360. Thank you.

Sincerely,

for Jeff Scott, Director
Waste Management Division

Enclosure with attachments

Cc: Don Quinata, Guam EPA
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LeRoy Moore. Unitek Environmental Guam
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

April 18, 2014

EPA Conditional Approval for Country Club of the Pacific
215 CCP Lane, Yona, Guam 96915
TSCA PCB Cleanup Approval Under 40 CFR 761.61(a) and 761.61(c)

A. Introduction

The U.S. Environmental Protection Agency Region 9 (EPA) hereby approves with conditions the *"Site Work Plan PCB Transformer Removal and Cleanup Country Club of the Pacific Yona, Guam"* dated February 2014 (Work Plan) under 40 CFR 761.61(a) and 761.61(c). The Work Plan was prepared by Unitek Environmental Guam (UEG) on behalf of the Country Club of the Pacific (CCP) for the cleanup of polychlorinated biphenyls (PCBs) at that site due to releases of Kanechlor from Japanese-made PCB transformers. Kanechlor is a Japanese-manufactured PCB transformer oil. This EPA conditional approval for cleanup of PCBs at the CCP is effective immediately.

B. Country Club of the Pacific Land Use, Sources of Contamination, Transport of Waste from Guam to Continental United States, and PCB Cleanup

1. **Land Use.** As of the date of this approval, EPA's understanding is that current and anticipated future land uses for the Country Club of the Pacific (CCP) are recreational.

2. **Sources of PCB Contamination.** According to CCP / UEG, the source of contamination is oil released from Japanese PCB transformers manufactured by Kitashiba Electric Co. LTD of Japan in 1972 (Transformers). The PCB oil is Kanechlor 300 and/or 400. The PCB concentration in oil from Transformers 1, 2, and 3 are 1,450, 2,550, and 1,570 ppm, respectively.

   Initial testing of the Transformers' dielectric fluid using Aroclor standards revealed PCBs below 500 ppm. However, the fingerprint of the Aroclor standards used in the laboratory analysis did not match the pattern of the PCBs in the oil from the Transformers. Kanechlor was determined to be the type of PCB oil inside that equipment.

   According to CCP / UEG, Transformers 2 and 3 released PCB oil. Also according to CCP / UEG, Transformer 1 was intact, no releases based on a comparison of the transformer's volume capacity and the volume of oil drained from the same transformer. However, as a precautionary measure this approval includes an approval condition requiring that CCP / UEG verify if PCB releases from Transformer 1 occurred.

3. **Transport of PCB waste from Guam to Continental United States for disposal.** The waste includes the three Transformers, PCB oil (Kanechlor 300 and/or Kanechlor 400), bulk PCB

remediation waste (e.g., soils and concrete containing PCBs), and liquid PCB remediation waste (e.g., water contaminated with PCB oil). The Serial Numbers (SN) of the Transformers to be disposed in the Continental US are 7291763 (Transformer 1), 07291764 (Transformer 2), and 07291764 (Transformer 3).

According to UEG, Transformers 1, 2, and 3 were in Guam before January 1, 1979; and the above PCB wastes were derived from releases of PCB oil from Transformers 2 and 3. Therefore, consistent with 40 CFR 761.99(c), the above PCB wastes can be transported to the Continental US for disposal. This determination is documented in the attached EPA Headquarters (EPA HQ, William Noggle) February 12, 2014 Email message responding to UEG's (LeRoy Moore) February 11, 2014 letter (attached) to EPA HQ regarding disposal of the above PCB waste.

Cleanup wastes (e.g., used personal protective equipment) and decontamination fluids (e.g., spent surfactants) are also likely to be generated during the PCB cleanup. Such waste is also associated with the cleanup of PCB releases from the Transformers and CCP / UEG should be able to dispose of that waste in the Continental US.

4. **PCB Cleanup.** In general and as modified by this approval, among other requirements, the PCB cleanup involves:

   a. Removal and disposal of the concrete pads associated with Transformers 2 and 3. If necessary, the Transformer 1 concrete pad will be removed for disposal.
   b. Excavation and disposal of soils contaminated with PCBs above the cleanup level of 25 mg/kg total PCBs; or above the established alternate cleanup level of 0.22 mg/kg total PCBs.
   c. Construction of a concrete cap in the area of Transformers 2 and 3; and if necessary in the area of Transformer 1.
   d. Cap inspection, maintenance, and repair in perpetuity following an EPA approved plan. A restrictive land use covenant is also required.

C. EPA's Conditions of Approval – Country Club of the Pacific (CCP)

EPA hereby approves with conditions the Work Plan and Sampling and Analysis Plan for cleanup and sampling of PCBs at the CCP under 40 CFR 761.61(a) and 761.61(c). EPA establishes general and specific conditions below.

1. General Conditions of Approval

a. Applicability of this approval, PCB cleanup sites, additional PCB characterization, and/or cleanup. This approval only applies to the former Transformer 1, 2, and 3 areas referred to here as Transformer Sites 1, 2, and 3, respectively. Each Transformer Site is a PCB cleanup site within the CCP in Guam. As such, each Transformer Site encompasses all areas to where PCBs may have migrated from the original PCB release location. EPA reserves the right to require additional characterization and/or cleanup of PCBs at the CCP if new information shows that

PCBs remain at the Transformer Sites above the approved cleanup levels or if PCBs are found at other areas within or immediately adjacent to the CCP.

b. **PCB wastes to be shipped for disposal in the Continental United States.** The PCB wastes to be shipped from Guam to the Continental US for disposal are identified in UEG's February 11, 2014 letter (attached). Such PCB wastes are located at the Transformer Sites within the CCP. After the initial cleanup (soil and transformer concrete pad removal), residual PCBs may remain in soils above the approved cleanup level(s) at any or all the Transformer Sites. Consequently, PCB wastes that may be generated during additional cleanup activities (immediately following the initial cleanup) to achieve the cleanup level at these sites can be shipped to the Continental US for disposal. Those additional PCB wastes are also considered to be derived from the original PCB releases at the Transformer Sites.

c. **Compliance with this approval and other applicable regulations and permits.** Departure from the approval conditions established here without prior written permission from EPA may result in the commencement of proceedings to revoke this approval, and/or an enforcement action. Nothing in this approval bars EPA from imposing penalties for violations of this approval or for violations of other applicable TSCA PCB requirements or for activities not covered under this approval.

This conditional approval does not relieve the owner and the cleanup party from complying with state and local regulations and permits as those implemented by Guam EPA and other applicable Federal regulations and permits.

d. **PCB Spill Cleanup Policy, reporting to the National Response Center, and actual date of PCB release.** Within 7 days after the date of this approval confirm in writing the date when the PCB releases were discovered at the CCP. The documentation that EPA has indicates that oil samples were collected from the Transformers in October 2013.

The releases of PCBs that occurred at the CCP were not reported to the National Response Center (NRC) as required in 40 CFR 761 Subpart G (PCB Spill Cleanup Policy). Releases of PCBs at concentrations equal to or above 50 mg/kg must be promptly reported to the NRC and within the reporting timeframes established in Subpart G.

The PCB cleanup at the CCP is being conducted under 40 CFR 761.61(a) and 761.61(c) and not 40 CFR 761 Subpart G. As such, Subpart G cleanup approaches are now not applicable to the PCB cleanup at the Transformer Sites within the CCP. The requirements in 40 CFR 761.61(a) must be followed as prescribed, except as modified by the conditions of approval consistent with 40 CFR 761.61(c).

2. Specific Conditions of Approval – Site Work Plan

The following conditions apply to Transformer Sites 2 and 3 where releases from PCB Transformers 2 and 3 (SNs 07291764 and 07291764, respectively) occurred. According to CCP / UEG releases of

PCBs did not occur at the PCB Transformer 1 (SN 7291763) location. However, EPA has included conditions for the Transformer 1 location as a precautionary measure.

a. **Approved PCB cleanup levels.** EPA is approving the PCB cleanup level equal to or less than 25 mg/kg total PCBs proposed in Section 4.6 (Characterization and Verification Sampling) of the Work Plan as modified in this condition. Soils with residual PCB concentrations equal to or below 25 mg/kg total PCBs must be capped to prevent mobilization of PCBs given the heavy rainy season and type of geology at the Transformer Sites. The cap must be constructed of concrete and meet the cap requirements in 40 CFR 761.61(a)(7). In addition, refer to Condition C.2.b (Soils for use as excavation backfill material).

   Alternative cleanup level. PCB impacted soils at the Transformer Sites may be cleaned up to 0.22 mg/kg total PCBs. This is EPA's Regional Screening Level for unrestricted land use and without additional conditions (e.g., land use restrictive covenant). EPA is establishing this alternative cleanup level under 40 CFR 761.61(c). In addition, refer to Condition C.2.b.

   EPA is not approving other cleanup levels (established in 40 CFR 761.61(a)(4)) that CCP / UEG proposed in the Work Plan for the Transformer Sites. EPA may reconsider this decision, if necessary.

   Within 60 days after the date when EPA deems the field work as complete, the property owner must submit a restrictive land use covenant and a cap inspection, maintenance, and repair plan (Cap Plan) for EPA's review and approval. The Cap Plan is to be implemented in perpetuity. EPA is requiring the restrictive covenant under 40 CFR 761.61(c) if residual PCB concentrations remain in soils at or below 25 mg/kg total PCBs and above 0.22 mg/kg total PCBs. <u>However, if the alternative cleanup level of 0.22 mg/kg total PCBs is achieved, capping of the Transformer Sites, the LUC, and Cap Plan would not be required.</u>

b. **Soils for use as excavation backfill material.** Regardless of their source, soils planned to be used as excavation backfill must be tested for PCBs and the analytical results provided to EPA before their use. The sentence in the eighth (8^{th}) bullet under Section 1.4 (Scope of Work) and any other section in the Work Plan or the Sampling Plan where the same or similar sentence or concept appears is not covered by this approval. That sentence states: "Excavate, package and transport contaminated soil from the site and transport back treated soil as fill material."

c. **PCB cleanup sites.** The PCB cleanup sites are defined in General Condition C.1.a.

d. **Site characterization and cleanup verification following initial soil removal and concrete pad removal.** The PCB Transformers' concrete pads and soils contaminated by PCB transformer oil beyond (lateral) and beneath (vertical) the concrete pads must be removed for disposal. Post-removal soil samples must be collected in situ for laboratory analysis using sampling grid sizes that are applicable to each Transformer Site.

The approach in 40 CFR 761.120 (PCB Spill Cleanup Policy) for site characterization and cleanup relying on visible traces does not apply. The lack of visible contamination does not necessarily mean that PCBs are not present beyond the initial limits of excavation.

UEG proposed to follow the requirements in 40 CFR 761.61(a) for cleanup of PCBs at the CCP. The requirements in this paragraph must be implemented as prescribed unless modified by this approval under 40 CFR 761.61(c). In addition, the 10-foot characterization sampling grid is too large for PCB characterization at the Transformer Sites. A modified grid size appropriate for each Transformer Site must be used consistent with 40 CFR 761.283(c) or CCP / UEG may propose sampling grids and locations under 40 CFR 761.61(c) for EPA approval.

As an alternative to the above, under this condition and consistent with 40 CFR 761.61(c), EPA approves and allows CCP / UEG to use a combined post-removal soil characterization and cleanup verification sampling grid if discrete samples are collected. If analytical results for each sample demonstrate the vertical and horizontal extent of total PCBs do not exceed the 25 mg/kg total PCB cleanup level, the site is considered ready for capping with concrete. If soils remain above the 25 mg/kg cleanup level, additional soil must be removed and samples collected and analyzed to demonstrate that residual PCB levels are equal to or below the cleanup level before capping.

Alternatively, if the analytical results for each sample demonstrate the vertical and horizontal extent of total PCBs in soils do not exceed 0.22 mg/kg total PCBs, the site is considered cleaned up and no capping or land use restrictions are necessary. If the soils exceed 0.22 mg/kg additional soil must be removed and samples collected and analyzed to verify residual PCB levels are equal to or below the 0.22 mg/kg cleanup level.

Within 7 days after the date of this approval, confirm which of the options established above will CCP / UEG follow for post-removal soil characterization and cleanup verification sampling.

e. **PCB concentration for disposal.** Soils and concrete must be sampled in situ (that is before excavation or disturbance), to determine the PCB concentration for disposal consistent with 40 CFR 761.61. The concentration for disposal must not be determined after the soils or concrete has been excavated and placed in stockpiles or containers.

As an alternative to sampling bulk PCB remediation waste (e.g., PCB-impacted soils and transformer concrete pads) for disposal, CCP / UEG must assume, consistent with 40 CFR 761.61(a)(5)(i)(B)(2)(i), that such waste contains total PCBs at or above 50 mg/kg.

f. **Waste management plan and anticipated wastes.** Table 5-1 lists different types of wastes that will be generated during the PCB cleanup at the Transformer Sites. Within 7 days after the date of this approval submit a revised Table 5-1 that addresses the comments in this condition. The PCB wastes to be removed from CCP and transported to the Continental US must be the same wastes described in CCP / UEG's correspondence to EPA.

A written confirmation by CCP / UEG must be provided that identifies the "local" disposal site to where waste is planned to be disposed of and includes a copy of their permit with conditions allowing acceptance of PCBs below 50 mg/kg.

Comments: The "Green waste" must exclude vegetation root bowls. Vegetation root bowls may be in contact with soils containing PCBs and should be disposed of as bulk PCB remediation waste. Measures must be taken to minimize formation of vapors inside the waste sacks that may affect the sacks' physical integrity while in transit to the Continental US and the disposal site.

Clarify what is the "construction debris" waste listed in Table 5-1. Such waste is either assumed to contain PCBs at 50 mg/kg or above for disposal, or discrete samples representative of this waste are collected in situ and analyzed to determine actual concentration for disposal.

Decontamination liquids must be sampled to determine actual PCB levels and disposed of based on the actual PCB concentration. Based on the TSCA PCB regulations, unrestricted use of water containing total PCBs below 0.5 ug/L is allowed. Water containing total PCBs above 0.5 ug/L must be disposed of via incineration (40 CFR 761.61(b)); or depending on the PCB concentration used or disposed of consistent with 40 CFR 761.79(b)(1) **and**, as applicable, also consistent with local discharge permit limitations.

g. **PCB waste transporters.** Within 7 days after the date of this approval, submit the information required in this condition. All the transporters of the PCB waste must complete and submit the Notification of PCB Activity (EPA Form 7710-53 latest revision) to EPA HQs before transportation of the waste to the Continental US. This includes all transporters involved with the transport of the waste from (1) the CCP to the port in Guam from where the waste will be shipped to the Continental US, (2) the port in Guam to the Port of Long Beach, California, and (3) the Port of Long Beach to US Ecology in Nevada.

   If Matson Navigation Company is not the transporter that will transport the waste from the Continental US' port of entry (likely, Port of Long Beach) to US Ecology for disposal, then that transporter must be identified by name and EPA ID number. Such transporter is also required to submit a Notification of PCB Activity to EPA HQs.

h. **Notification of PCB Activity submitted to EPA by Hajime Ogimi San and storage of PCB waste awaiting disposal in the Continental US.** Storage of the waste prior to disposal is subject to the TSCA PCB requirements in 40 CFR 761.65. Within 7 days after the date of this approval, confirm the requirements that CCP / UEG is following for temporary storage of the PCB waste prior to transport for disposal.

i. **Shipping containers for PCB items and bulk PCB remediation waste.** PCB items, PCB transformer oil, and bulk PCB remediation waste will be shipped to the Continental US for disposal. EPA approves the approach that CCP / UEG will use to ship the waste to the Continental US if shipped consistent with the clarifications that UEG provided during the April 8, 2014 phone conversation with EPA.

To prevent rupture of the sacks, UEG clarified that a wooden box will be constructed inside DOT approved sacks before placing PCB impacted concrete and soils inside the sacks. The waste sacks will be placed in a metal container (sea van) for transport from Guam to the Continental US, and within the Continental US to US Ecology in Nevada. The PCB transformers and drums containing PCB oil and other items from the Transformer Sites will be transported in a second metal container.

Within 7 days after the date of this approval, please explain CCP / UEG's contingencies to cleanup the metal shipping containers if PCB waste is released from the drums and/or sacks.

3. **Specific Conditions - Sampling and Analysis Plan**

a. **Only collection of samples is approved as modified by the conditions established below.** This approval allows the collection of samples at the Transformer Sites via implementation of the SAP as modified in this approval. However, the analysis of those samples at a laboratory is not approved or allowed. Based on the information requested in Condition C.3.i, EPA will determine if the laboratory's analytical procedures for PCBs in Kanechlor reliably quantify PCBs in materials and environmental samples where the matrix is contaminated with Kanechlor. EPA will notify CCP / UEG of its determination in a timely manner.

b. **Section 1.2.3 Regulatory Standards.** Refer to Condition C.2.a above. In addition, as a clarification, the 25 mg/kg total PCBs is referred to in 40 CFR 761.61 as a cleanup level and not a standard. Only the 25 mg/kg cleanup level for PCBs is being approved here and with the condition that a cap be constructed in Transformer Sites 2 and 3. If necessary, a cap would also be constructed at the Transformer 1 Site.

c. **Section 3.2, General Sampling Methods.** The SAP is modified here consistent with Conditions C.2.d and C.2.e above. In summary, in Condition C.2.d EPA requires a sampling grid for the Transformer Sites that is of a size applicable to those sites and allows the use of one grid for both characterization and cleanup verification if discrete soil samples are collected. In contrast, 40 CFR 761.61(a) requires that first site characterization samples be collected based on a 10-foot grid and second that cleanup verification sampling be conducted based on a 5-foot grid.

d. **Sections 3.2 General Sampling Methods and 3.2.1 Excavated Soil Characterization Sample Collection.** Refer to Condition C.3.b and C.2.e in reference to determining concentration for disposal of soils to be removed after the initial excavation is complete. The SAP is modified by those conditions.

e. **Section 3.2.2 Verification Soil Sample Collection.** Condition C.3.b modifies this section of the SAP. Soil discrete samples must be collected for combined characterization and cleanup verification sampling.

f. **Section 3.2.3 Investigation Derived Waste and Debris Disposal.** The disposal of personal protective equipment must be consistent with 40 CFR 761.61(a)(5)(v)(A); or the PPE decontaminated consistent with an applicable method in 40 CFR 761.79.

g. **Section 3.2.4 Chemical Analysis.** All analytical results must be reported as dry weight. While a cleanup party has a choice of EPA Method 3540C (Soxhlet extraction) or 3550C (Ultrasonic extraction) or latest revisions of those methods for extraction of PCBs from bulk samples, EPA prefers that Method 3540C be used. The PCB laboratory analysis must be conducted using EPA method 8082A or latest revision.

h. **Section 4.2, Sample Collection and Sample Handling Procedures.** Samples must be collected in 250-mL wide-mouth glass containers with PTFE-lined lids. The samples must be maintained cool from collection in the field until arrival to the laboratory at a temperature equal to or below six (6) degrees. CCP / UEG must adhere to the temperature requirements for sample preservation. The holding time for the samples before extraction is about 160 days. Each sample must be thoroughly homogenized before extraction. All samples must be subject to a post extraction cleanup procedure to minimize interferences with the analysis.

i. **Kanechlor vs. Aroclor laboratory analysis.** Within 7 days after the date of this approval, submit to EPA the information listed below. Within 14 days after the date of this approval, schedule a conference call among EPA, CCP, UEG, and the analytical laboratory to discuss the matters addressed in this Condition.

1. The analytical laboratory's operating procedure to analyze PCB remediation waste samples (e.g., soil, concrete, decontamination waste containing Kanechlor) from the Transformer Sites impacted by PCBs as Kanechlor.
2. A verification of the analytical standards to be used in the analysis of PCBs as Kanechlor in samples from the Transformer Sites.
3. A copy of the modified EPA method 8082 used in the analysis of oil from the Transformers.
4. Chromatograms clearly demonstrating the "fingerprint" for each Aroclor standard mixture, each Kanechlor standard mixture, and all different "fingerprints" observed in samples from the Transformers oil, including any surrogate or internal standard compounds used for the analyses.
5. Identification of the chromatographic peaks used for "fingerprint" identification and PCB quantitation.
6. Sample calculations used to quantify concentrations in samples.

Comment: Based on our review of the SAP, apparently Aroclor 1242 is being used as reference for analysis of samples from the Transformer Sites contaminated by Kanechlor (not Aroclor) releases. And we understood that Japanese Kanechlor standards were previously used for the analysis of the transformer oil.

Santos, Carmen

From: Noggle, William
Sent: Wednesday, February 12, 2014 12:28 PM
To: LeRoy Moore
Cc: Gimlin, Peter; Picardi, Rick; Santos, Carmen
Subject: RE: CCP EPA Cover Letter example 2-11-14
Attachments: Unitek USEPA PCB Importation 2-11-14.pdf

Mr. Moore,
This email is in response to your letter (attached), regarding the transportation of PCBs to the Continental United States from Guam for disposal.

Transporting PCB waste between States is permissible under 761.99(c). Also, Guam is considered a 'state' under the definition of such in TSCA Section 3(13). Thus, transporting the PCB waste referenced in your letter from Guam to the Continental United States is permissible under 40 CFR 761.99(c), because the waste was present in Guam prior to January 1, 1979.

If you have any further questions, please let me know.

Thank you,
Bill

From: LeRoy Moore [mailto:unitek@ite.net]
Sent: Tuesday, February 11, 2014 3:45 PM
To: Noggle, William
Subject: RE: CCP EPA Cover Letter example 2-11-14

Bill:
Email will suffice.
Thanks for your attention to this matter.

LeRoy Moore
President
Unitek Environmental Guam
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Email: unitek@ite.net
Website: www.unitekguam.com

From: Noggle, William [mailto:Noggle.William@epa.gov]
Sent: Wednesday, February 12, 2014 2:53 AM
To: unitek@ite.net
Subject: FW: CCP EPA Cover Letter example 2-11-14
Importance: High

Mr. Moore,
Would confirmation via email suffice? Or are you looking for a signed letter responding to your request?

Thanks,
Bill

From: Gimlin, Peter
Sent: Tuesday, February 11, 2014 11:37 AM
To: Noggle, William
Subject: FW: CCP EPA Cover Letter example 2-11-14
Importance: High

From: LeRoy Moore [mailto:unitek@ite.net]
Sent: Tuesday, February 11, 2014 12:25 AM
To: Gimlin, Peter
Cc: 'Tom Haneda'; 'Brad Wolfe'; 'Gabriel Simon'; 'Hajime Ogimi'; morinaga@kona.net; Don Quinata; Santos, Carmen
Subject: RE: CCP EPA Cover Letter example 2-11-14
Importance: High

Mr. Gimlin:
The attached letter is submitted to your office per our telephone discussion with Ms. Carmen Santos of USEPA Region IX. Thank you for your immediate attention to this matter.

LeRoy Moore
President
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February 11, 2014

Mr. Peter Gimlin
US Environmental Protection Agency
EPA West Building
National Program Chemicals Division
1200 Pennsylvania Avenue, NW
Mail Code 7404T
Washington, DC 20460

Reference: Confirmation Request for Transportation and Disposal of PCB Transformers at Country Club of the Pacific Golf Course, Yona Guam to The United States Mainland for Disposal

Dear Mr. Gimlin:

This letter is submitted relative to a telephone discussion today with Ms. Carmen Santos of USEPA Region IX relative to transportation and disposal of PCB transformers from Country Club of the Pacific (CCP) golf course in Yona, Guam. Unitek Environmental Guam has been retained by CCP for environmental services relative to this matter.

Three (3) each Japanese manufactured transformers with oil have been identified at the site. The oil has been removed from the transformers and is contained within 29 each 55 gallon drums. Laboratory analyses of oil from each transformer has indicated PCB concentrations greater than 500 ppm. The transformer serial numbers and concentrations of PCBs within the oil drained from each transformer is as follows:

No.	Transformer	Serial Number	Manufacture Date	PCB Level
1.	Transformer 1	SN: 07291763	1972	1,450 ppm
2.	Transformer 2	SN: 07291764	1972	2,550 ppm
3.	Transformer 3	SN: 07291765	1972	1,570 ppm

PCB pattern appears to be Kanechlor-300 or Kanechlor-400, a Japanese manufactured PCB.

The subject transformers and oil were installed at the Country Club of the Pacific, Yona, Guam prior to 1979 during construction of the golf course in 1973. These items, as well as PCB contaminated debris, concrete and soil, are to be shipped for disposal to the United States in accordance with TSCA regulations. Based on current regulations, the

importation and disposal is allowed in the United States under TSCA 40 CFR 761.99(c) and Territories Rule, Federal Register / Vol. 66, No. 62 / Friday, March 30, 2001. Country Club of the Pacific has retained Unitek Environmental Guam (EPA ID Number GUD982430944) to assist them in environmental compliance activities for this material.

Per our telephone conversation today with Ms. Santos of EPA Region IX, she has requested that we contact you directly to confirm that the PCB transformers, oil, debris, and soil can be imported and disposed in the United States as authorized by under TSCA 40 CFR 761.99(c) and Territories Rule, Federal Register / Vol. 66, No. 62 / Friday, March 30, 2001.

Accordingly, we respectfully request that you respond to this letter regarding the importation and disposal of this material. Transportation, disposal, and other remedial actions are currently on hold pending resolution of this matter.

If you have any questions, please feel free to contact me at 671-565-3151 or via email unitek@ite.net .

Respectfully,

LT Moore

LeRoy Moore
President